

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**GRUPO AEROMÉXICO, S.A.B. de C.V., et
al.,**

Debtors.¹

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**FIRST SUPPLEMENTAL DECLARATION OF ALEJANDRO SAINZ IN SUPPORT OF
AN ORDER AUTHORIZING DEBTORS TO EMPLOY AND RETAIN SAINZ
ABOGADOS, S.C. AS SPECIAL MEXICAN COUNSEL FOR THE DEBTORS NUNC
PRO TUNC TO NOVEMBER 1, 2020**

Alejandro Sainz declares as follows:

1. I am the founding partner of Sainz Abogados, S.C. (“**Sainz Abogados**”), a newly-formed law firm with its principal office at Boulevard Manuel Avila Camacho 24, Floor 21st, Lomas de Chapultepec, 11000, Mexico City, Mexico, and I am duly authorized to make this declaration (this “**First Supplemental Declaration**”) on behalf of Sainz Abogados. Previously, I was a founding partner at Cervantes Sainz, S.C. (“**Cervantes Sainz**”). Cervantes Sainz was retained pursuant to section 327(e) of the Bankruptcy Code as special Mexican counsel for the Debtors, *Nunc Pro Tunc* to the Petition Date, on September 22, 2020 [Docket No. 448] (the order approving such retention, the “**Cervantes Sainz Retention Order**”). I was the declarant in support of the application for the retention of Cervantes Sainz (the application and supporting materials collectively, the “**Cervantes Sainz Retention Application**”) and I submitted a

¹ The Debtors in these cases, along with each Debtor’s registration number in the applicable jurisdiction, are as follows: Grupo Aeroméxico, S.A.B. de C.V. 286676; Aerovías de México, S.A. de C.V. 108984; Aerolitoral, S.A. de C.V. 217315; Aerovías Empresa de Cargo, S.A. de C.V. 437094-1. The Debtors’ corporate headquarters is located at Paseo de la Reforma No. 243, piso 25 Colonia Cuauhtémoc, Mexico City, C.P. 06500.

supplemental declaration in support of the Cervantes Sainz Retention Application on September 22, 2020 [Docket No. 440] (the “**Cervantes Sainz Supplemental Declaration**”).

2. I submit this First Supplemental Declaration in connection with (a) the *Notice of Presentment of an Order Authorizing Debtors to Substitute Sainz Abogados, S.C. for Cervantes Sainz, S.C. as Special Mexican Counsel for the Debtors Nunc Pro Tunc to November 1, 2020* [Docket No. 960], (b) the *Declaration of Alejandro Sainz in Support of the Substitution of Sainz Abogados, S.C. for Cervantes Sainz, S.C. as Special Mexican Counsel for the Debtors nunc pro tunc to November 1, 2020* [D.I. 960-3] in connection therewith, and (c) the *Order Authorizing Debtors to Employ and Retain Sainz Abogados, S.C. as Special Mexican Counsel for the Debtors Nunc Pro Tunc to November 1, 2020* [D.I. 1008] (the “**Retention Order**”). Unless otherwise stated in this First Supplemental Declaration, I have personal knowledge of the facts set forth herein.

Supplemental Response Concerning U.S. Trustee Guidelines Question

3. As part of the *First Interim Application for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from November 1, 2020 Through December 31, 2020* [D.I. 1032] (the “**First Interim Application**”), I provided a statement in which I answered a series of questions with respect to section C.5 of the U.S. Trustee Guidelines, including the following:

Question: Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees.

Answer: No. Sainz Abogados reserves the right to seek such fees in subsequent applications.

4. I hereby clarify and supplement the above answer as follows: Sainz Abogados has not included any time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices in its First Interim Application. Sainz Abogados will not be seeking compensation for reviewing or revising time records or preparing, reviewing, or revising invoices from the November 1, 2020 through the date hereof.

5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Declaration was executed on April 28, 2021.

By: /s/ Alejandro Sainz
Alejandro Sainz
Senior Partner
Sainz Abogados, S.C.